UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

UNITED STATES OF AMERICA)
) No. 3:24-CR-00151
) JUGDE RICHARDSON
v.)
)
MATTHEW ISSAC KNOOT)

<u>UNOPPOSED MOTION TO CONTINUE TRIAL AND RELATED DEADLINES</u>

Through undersigned counsel, Matthew Knoot moves this Court to continue the trial in this matter, currently set for Monday, October 15, 2024, at 9:00 a.m. (D.E. 12). Counsel requests the Court continue the trial for up to sixty (60) days. Mr. Knoot also requests a continuance of all trial-related deadlines. In support of this motion, Mr. Knoot asserts the following:

- 1. Undersigned counsel was appointed to represent Mr. Knoot on August 8, 2024. (D.E. 11)

 On that same day, Mr. Knoot was arraigned and entered a plea of not guilty.
- 2. Mr. Knoot was released from custody on that same day and has been in the community since.
- 3. The undersigned received discovery in this matter on August 14, 2024. As of the date of this motion, counsel has not completed discovery review, as it is voluminous. Counsel has counsel been unable to review discovery with Mr. Knoot.
- 4. Counsel requests more time to complete discovery review, investigate leads, and create a defense plan.
- Counsel has conferred with opposing counsel who stated she does not oppose this
 motion.
- 6. This motion is filed contemporaneously with Mr. Knoot signed speedy trial waiver.

Based on the foregoing, Mr. Knoot requests this Court grant his motion and continue the trial and all related deadlines for up to 60 days.

Respectfully submitted,

s/ David Fletcher

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CERTIFICATE OF SERVICE

I hereby certify that on October 4, 2024, I electronically filed the foregoing *Unopposed Motion to Continue Trial and All Related Deadlines* with the U.S. District Court Clerk by using the CM/ECF system, which will send a Notice of Electronic Filing to the following: Josh Kurtzman, Assistant United States Attorney, 719 Church Street, Suite 3300, Nashville, Tennessee, 37203.

s/ David Fletcher
DAVID FLETCHER